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August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So.
Ag. Stop 0268
Washington, D.C. 20250

Subject: Docket Number TM-04-07

Dear Mr. Neal:

On behalf of the American Spice Trade Association (ASTA), I am pleased to submit the following comments in response to the notice, "National Organic Program, Sunset Review" 70 Fed. Reg. 35177 (June 17, 2005). ASTA represents the interests of approximately 300 members including companies that grow, dehydrate and process spices. ASTA members and their customers produce spices and spice blends certified as organic under the National Organic Program.

ASTA Requests Renewal of Certain Items in Section 205.605

ASTA requests that the National Organic Standards Board renew the exemptions allowing the use of the following items as nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or made with organic (specified ingredients or food groups), § 205.605:

- Acids, citric and lactic (used as acidulant to adjust for ph stability)
- Colors - nonsynthetic sources only (used to add color to seasoning blends)
- Flavors - nonsynthetic sources only (used to add flavor)
- Sodium bicarbonate (used as buffer and neutralizer)
- Carnauba wax (used as formulation aid, lubricant and release agent)
- Yeast - nonsynthetic only, Autolysate; Bakers; Brewers; Nutritional; and Smoked (used as a flavor ingredient)
- Alginates - (used to maintain texture)
- Ascorbic acid - (used as an antioxidant)
- Chlorine materials - (used for disinfecting and sanitizing food contact surfaces)
- Lecithin - bleached (used as emulsifier for product stability and solubility)
- Silicon dioxide - (used as an anticaking agent)

- Xanthan gum (used as a thickener)

The items listed above are important to ASTA members as either components of certified organic spice blends or as processing aids used in their production. Therefore, ASTA requests that the NOSB renew the exemption allowing their use.

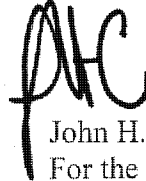
ASTA Requests Renewal of Certain Items in Section 205.606

ASTA requests that the National Organic Standards Board renew the exemptions allowing the use of the following items as nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or made with organic (specified ingredients or food groups), § 205.606:

- Cornstarch, native - (used as flavor carrier)
- Gums - water extracted only (Arabic, guar, locust bean, carob bean) - (used as flavor carrier or emulsifier)

We are grateful for the opportunity to comment during the Sunset Review, and we are available to provide additional information to the NOSB.

Sincerely,



John H. Cox
For the American Spice Trade
Association

CC: Cheryl Deem, Executive Director